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20 *Interim Class Counsel*

21 *(additional Plaintiffs' counsel appear on the*
22 *signature block)*

23 **UNITED STATES DISTRICT COURT**
24 **CENTRAL DISTRICT OF CALIFORNIA**
25 **SOUTHERN DIVISION**

26 In re: Shimano Crankset Litigation

Case No.: 8:23-cv-02038-JVS(JDEx)

27 **NOTICE OF MOTION AND**
28 **MOTION FOR PRELIMINARY**
APPROVAL OF CLASS
SETTLEMENT AND DIRECTION
OF NOTICE UNDER FED. R. CIV. P.
23(e)

Date: July 28, 2025
Time: 1:30 pm
Courtroom: 10C
Judge: Hon. James V. Selna

1 Please take notice that on Monday, July 28, 2025, at 1:30 PM, or as soon
2 thereafter as the matter may be heard in Courtroom 10C of the Ronald Reagan
3 Federal Building and United States Courthouse, 411 West 4th Street, Room 1053,
4 Santa Ana, California 92701, Plaintiffs will, and hereby do, move the Court for an
5 Order preliminarily approving the proposed Settlement in this action and: (1)
6 finding under Rule 23(e)(1) that it is likely to approve the proposed Settlement and
7 certify the Settlement Class; (2) appointing Plaintiffs Steven Adelman, John
8 Bongiovanni, Jose Delgado, Jose Erazo, Dave Gonyer, Jarett Hawkins, Christopher
9 Jennings, Moussa Kouyate, Marcus Lewis, Kevin Litam, Maurice Scorsolini,
10 Dimitri Semizarov, and Mike Tirado, as Class Representatives; (3) appointing Epiq
11 as Settlement Administrator and directing notice to the Settlement Class pursuant to
12 the proposed Notice Program; and (4) scheduling a final approval hearing under
13 Rule 23(e)(2).

14 This Motion is based on this Notice, as well as the accompanying
15 Memorandum of Law; Joint Declaration of Roland Tellis, Stephen Larson, and
16 Jason Lichtman; the Declaration of Cameron R. Azari, Esq., all other facts the
17 Court may or should take notice of, all filings, records, and proceedings in this case,
18 and any oral argument that the Court may entertain.

19 Dated: June 30, 2025

20 By: /s/ Roland Tellis
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22 Sterling Cluff (SBN 267142)
23 David Fernandes (SBN 280944)
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